

1 Lawrence K. Engel
2 Attorney at Law
3 40 Lake Bellevue #100
4 Bellevue, WA 98009
5 (425) 454-5500

6 Hon. Christopher M. Alston
7 Chapter 11/Seattle
8 Hrg. Date: August 24, 2018 @ 9:30 am
9 Resp. Date: **August 17, 2018**

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**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

26 In re:
27 NORTHWEST TERRITORIAL MINT,
28 LLC
29 325 E. Washington St. #226
30 Sequim, WA 98382,
31
32 Debtor.

33 Case No. 16-11767-CMA

34 NOTICE OF HEARING COMBINED
35 WITH MOTION TO WITHDRAW AS
36 COUNSEL FOR CREDITOR

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1 U.S. District Court (incorporated into the Local Rules of the above-entitled Court by reference) as
2 follows:

3 1. Mr. Engel has appeared in the above-entitled case for Chris A. Trivelas, Creditor, for
4 monitoring purposes from May 11, 2016 to present. Mr. Trivelas filed his own Proof of Claim in
5 the amount of \$151,880 at Claim No. 1980 on May 18, 2016. All administration of the above-
6 entitled case has been going smoothly under the Trustee's able hand since the time of filing. There
7 will be little or no further meaningful work for the Mr. Trivelas' counsel to do in this case, which
8 is approaching resolution.

9 2. Mr. Engel seeks to withdraw as counsel for the Mr. Trivelas herein since he has
10 scheduled a planned retirement for the end of the calendar year 2018. Mr. Engel also has
11 experienced some significant health issues in the end of 2017 and early 2018, that require his
12 attention at this time.

13 3. Based on the foregoing, there is good cause shown to authorize Mr. Engel's withdrawal
14 as counsel for Chris A. Trivelas, in the above-entitled case. The last known address for the Mr
15 Trivelas is that listed on the Claim No. 1980: **P.O. Box 725, North Bend, WA 98045-0725**

16 WHEREFORE, Mr. Engel respectfully requests that the Court grant relief on the above
17 Motion to Withdraw as requested. This Motion is verified by the subjoined Declaration of
18 Lawrence K. Engel.

19 16 IF YOU OPPOSE the subjoined Motion to Withdraw and/or any of the relief specified
20 above, you must file your written response with the Clerk of the U.S. Bankruptcy Court, U.S.
21 Courthouse, 700 Stewart St., Room 6301, Seattle, WA 98101-1271, serve two copies on the
22 Judge's Chambers, and serve one copy on the undersigned Lawrence K. Engel, Counsel for the
23 moving party, 40 Lake Bellevue #100, Bellevue, WA 98005 NOT LATER THAN the
24 RESPONSE DATE, which is **August 17, 2018**.

25 21 IF NO RESPONSE IS TIMELY FILED AND SERVED, the Court may, in its discretion,
22 GRANT THE MOTION PRIOR TO THE HEARING, WITHOUT FURTHER NOTICE, and
23 strike the hearing.

24 NOTICE OF HEARING COMBINED WITH MOTION
25 TO WITHDRAW AS COUNSEL FOR CREDITOR - 2

Lawrence K. Engel
Attorney at Law
40 Lake Bellevue #100
Bellevue, WA 98009
(425) 454-5500

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6 DATED: July 17, 2018.
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/s/ Lawrence K. Engel
LAWRENCE K. ENGEL, WSBA #8421
Withdrawing Counsel for Chris A. Trivelas, Creditor

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DECLARATION
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33
34 I, LAWRENCE K. ENGEL, declare that the following is true and correct under penalty
35 of perjury, and pursuant to 28 U.S.C. § 1746:
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38 1. I am counsel for the Chris A. Trivelas in the above entitled Chapter 11 case and am
39 making this Declaration in support of the subjoined Motion. I have personal knowledge of all facts
40 attested to herein, and am competent to testify to same.
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43 2. I have read the subjoined Motion to Withdraw, and believe that all factual statements
44 contained therein are true and correct, under penalty of perjury, and hereby adopt same as my
45 testimony herein.
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48 I certify that the foregoing testimony is true and correct to the best of my knowledge and
49 belief under penalty of perjury.
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52 DATED at Mount Vernon, Washington this 17th day of July, 2018.
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